

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZHAOYIN WANG,
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,
AND ZHEJIANG BETA PHARMA
CO., LTD.,
Defendants.

No. 3:14CV1790 (VLB)

DECEMBER 22, 2014

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE
AN ANSWER OR MOTION DIRECTED TO THE COMPLAINT**

Defendants Beta Pharma, Inc. and Don Zhang hereby move pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 7(b) of the Local Rules of this Court for an extension of time to file an answer or motion directed to the Complaint, extending the deadline to that date which is seven (7) days after the Court issues a ruling on Defendants' currently pending Motion to Transfer [Doc. 17]. Under the Order issued by the Court on December 2, 2014 [Doc. 12], such an answer or motion is currently due on January 7, 2015. Defendants filed the Motion to Transfer on December 5, 2014, asking the Court to transfer this action to the United States District Court for the District of New Jersey. On December 10, 2014, Plaintiff filed a notice of his intent to oppose the Motion to Transfer [Doc. 19].

There is good cause for such extension. The Court's decision on the Motion to Transfer will determine whether this action will be litigated in this Court

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or in the District of New Jersey. If the action is transferred, Defendants will be represented by different counsel, any responsive pleading or motion that may be filed will be governed by different Local Rules, and any motion that may be filed will be considered by a different judge. It will conserve the resources of the both the Court and the parties if any responsive pleading, and the briefing on any motion that may be filed as a responsive pleading, is filed only after the Motion to Transfer is decided.

The undersigned counsel has contacted counsel for Plaintiff, who consents to the requested extension of time. This is Defendants' second motion for extension of time with respect to this deadline.

WHEREFORE, Defendants respectfully request that the deadline for the filing of an answer or motion directed to the Complaint be extended to that date which is seven (7) days after the date on which the Court rules on the Motion to Transfer.

DEFENDANTS BETA PHARMA, INC. AND DON
ZHANG,

By: /s/
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-- Their Attorney--

CERTIFICATION OF SERVICE

I hereby certify that on December 22, 2014 a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/
Michael G. Caldwell (ct 26561)